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 NEO4J, INC. and NEO4J SWEDEN AB

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

NEO4J, INC., a Delaware corporation, and
 NEO4J SWEDEN AB, a Swedish
 corporation,

Plaintiffs,

v.

PURETHINK LLC, a Delaware limited
 liability company, IGOV INC., a Virginia
 corporation, and JOHN MARK SUHY, an
 individual,

Defendants.

CASE NO. 5:18-CV-07182-EJD

**[PROPOSED] ORDER RE DEFENDANTS'
 ADMINISTRATIVE MOTION TO FILE
 EXHIBITS UNDER SEAL**

AND RELATED COUNTERCLAIM.

NEO4J, INC., a Delaware corporation, and
 NEO4J SWEDEN AB, a Swedish
 corporation,

Plaintiffs,

v.

GRAPH FOUNDATION, INC., an Ohio
 corporation, GRAPHGRID, INC., an Ohio
 corporation, and ATOMRAIN INC., a
 Nevada corporation,

Defendants.

CASE NO. 5:19-CV-06226-EJD

Now before the Court is Defendants and Counterclaimants' ("Defendants") Administrative Motion to File Exhibits Designated by Opposing Side as Highly Confidential-Attorneys' Eyes Only and Confidential Under Protective Order ("Administrative Motion"). Having considered the Administrative Motion and all papers submitted by the parties in support of the Administrative Motion and good cause appearing, the Court finds that:

1. There exists a compelling overriding confidentiality interests that have overcome the right of public access to the record of the following documents, and there is therefore good cause to file the documents under seal:

Identification of Materials to be Sealed	Designating Party Information
Exhibit 1 to Beene Declaration is a License Agreement NSW_000002-16	Constitutes Plaintiffs' private, highly confidential, and commercially sensitive business, operations, and financial information, and the disclosure of which would irreparably harm Plaintiffs' competitive standing in the marketplace, and provide competitors with information that could be used to obtain an unfair competitive advantage over Plaintiffs.
Exhibit 2 to Beene Declaration is a Royalty Statement NSW_000001	Constitutes Plaintiffs' private, highly confidential, and commercially sensitive business, operations, and financial information, and the disclosure of which would irreparably harm Plaintiffs' competitive standing in the marketplace, and provide competitors with information that could be used to obtain an unfair competitive advantage over Plaintiffs.
Exhibit 7 to Beene Declaration is an internal Neo4j, Inc. email thread. N4J_008109	Constitutes Plaintiffs' commercially sensitive and confidential information relating to their business model and competitive marketing

and licensing strategies, the disclosure of which would substantially harm Plaintiffs' competitive standing in the marketplace, and provide competitors with information that could be used to obtain an unfair competitive advantage over Plaintiffs.

2. A substantial probability exists that overriding confidentiality interests will be prejudiced if the record is not sealed;

3. The proposed sealing is narrowly tailored; and

4. No less restrictive means exist to achieve these overriding interests.

IT IS THEREFORE ORDERED that Defendants' Administrative Motion is GRANTED with respect to the documents set forth above and they HEREBY BE FILED UNDER SEAL.

IT IS SO ORDERED.

Dated: _____, 2021

Honorable Edward J. Davila